

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

DISABILITY RIGHTS SOUTH) Case No. 3:21-cv-02728-MGL
CAROLINA, ABLE SOUTH CAROLINA,)
AMANDA McDUGALD SCOTT,)
individually and on behalf of P.S., a minor;)
MICHELLE FINNEY, individually and on)
behalf of M.F., a minor; LYUDMYLA)
TSYKALOVA, individually and on behalf)
of M.A., a minor; EMILY POETZ,)
individually and on behalf of L.P., a minor;)
SAMANTHA BOEVERS, individually and)
on behalf of P.B., a minor; TAMICA)
GRANT, individually and on behalf of)
E.G., a minor; CHRISTINE COPELAND,)
individually and on behalf of L.C., a minor;)
HEATHER PRICE, individually and on)
behalf of H.P., a minor; and CATHY)
LITTLETON, individually and on behalf of)
Q.L. a minor,)
Plaintiffs,)
v.)
HENRY McMaster, in his official)
capacity as Governor of South Carolina;)
ALAN WILSON, in his official capacity as)
Attorney General of South Carolina;)
MOLLY SPEARMAN, in her official)
capacity as State Superintendent of)
Education; GREENVILLE COUNTY)
SCHOOL BOARD; Horry COUNTY)
SCHOOL BOARD; LEXINGTON)
COUNTY SCHOOL BOARD ONE;)
OCONEE COUNTY SCHOOL BOARD;)
DORCHESTER COUNTY SCHOOL)
BOARD TWO; CHARLESTON COUNTY)
SCHOOL BOARD; and PICKENS)
COUNTY SCHOOL BOARD,)
Defendants.)

**DEFENDANT MOLLY
SPEARMAN'S ANSWERS TO
LOCAL CIVIL RULE
26.01 INTERROGATORIES**

Defendant Molly Spearman, [“Spearman”], pursuant to the District of South Carolina Local Civil Rule 26.01, hereby sets forth her responses to the Local Civil Rule 26.01 Interrogatories and shows the Court as follows:

- (A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: None.

- (B) As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Plaintiffs seek equitable relief in their Complaint, which involves claims that should be tried nonjury.

- (C) State whether the party submitting these responses is a publicly-owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner or affiliate; (2) each publicly owned company which owns 10% or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Not applicable.

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis for any challenge to the appropriateness of the division).

RESPONSE: Defendant Spearman does not challenge the appropriateness of the division in which Plaintiffs have filed their claims.

- (E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal?

RESPONSE: No.

- (F) *[Defendants only.]* If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Not applicable.

- (G) *[Defendants only.]* If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter,

identify such person or entity and describe the basis of said liability.

RESPONSE: Unknown/not applicable at this time. Defendant Spearman would reserve the right to supplement this and any other Response, if necessary, at an appropriate time.

Cathy L. Hazelwood (Fed I.D. #5605)
State Superintendent of Legal Affairs
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and

s/Leslie A. Cotter, Jr. _____
Leslie A. Cotter, Jr. (Fed I.D. #320)
RICHARDSON PLOWDEN & ROBINSON, P.A.
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ATTORNEYS FOR DEFENDANT MOLLY
SPEARMAN, in her official capacity as State
Superintendent of Education

Columbia, South Carolina
September 1, 2021